



seguridade

***POLICY ON DISCLOSURE OF MATERIAL EVENTS  
OF CAIXA SEGURIDADE PARTICIPAÇÕES S.A.***

## 1 RESPONSIBLE UNIT

Administration, Finance and IR Office

## 2 TO WHOM THIS POLICY APPLIES

This Policy applies to all units of CAIXA Seguridade Participações S.A.

## 3 REGULATION

CVM Instruction 358 of January 3, 2002;

CVM Instruction 361 of March 5, 2002;

Law 6.404 of December 15, 1976;

B3's State-Owned Company Governance Program Regulation

## 4 PURPOSE

To establish rules and guidelines for communication, use and disclosure of Material Facts or other Company information deemed sensitive.

## 5 DEFINITIONS

- **Associates** – entities over which the Company has significant influence pursuant to Law 6.404/76.
- **Bodies specifically provided for in the bylaws** – the Executive Board, the Board of Directors, the Supervisory Board, the Audit Committee and other technical or advisory bodies of the Company created under the bylaws.
- **Caixa Seguridade or Company** – Caixa Seguridade Participações S.A.
- **Capital Market Agents** – regulatory bodies, stock exchanges, securities dealers and brokers, investors, portfolio managers, market analysts, self-regulatory associations and committees of the capital market.
- **Consultants** – all persons providing services for the Company and its Subsidiaries and Associates or the Controlling Stockholder, such as independent auditors, securities analysts, securities dealers and brokers, advisors, lawyers, accountants, who have access to Privileged Information.
- **Controlling Power** - the actual power to directly or indirectly conduct the corporate business and to direct the action of the governing bodies of the

investee, as a matter of fact or law. Ownership of control is to be presumed as to a person or Group of Shareholders holding such number of shares as may have secured an absolute majority of the votes cast by the shareholders present at the past three shareholders' meeting of the investee even though not holding such number of shares as would secure an absolute majority of the voting capital.

- **Controlling Stockholder** – a stockholder who exercises controlling power in the Company, i.e., Caixa Econômica Federal (“CAIXA”).
- **CVM** – the Brazilian Securities Commission.
- **DFP** – the Standard Financial Statements of the Company.
- **Directors and Officers** – members of the Management Bodies.
- **Employees** – individuals who have a contract of employment with Caixa Econômica Federal (“CAIXA”) and work for Caixa Seguridade or its Subsidiaries.
- **Former Directors and Officers** – individuals who were, but have ceased to be, members of management bodies specifically provided for the bylaws of the Company and its Subsidiaries and Associates or the Controlling Stockholder.
- **Government Representatives** - representatives of the Federal Government such as Public Controller of Caixa Seguridade, i.e., the Ministry of Finance and the Ministry of Planning, Development and Management.
- **Group of Shareholders** – a group of persons: (i) linked by contracts or agreements of any nature, including shareholders' agreements, oral or written, whether directly or through any companies Controlled by, Controlling or under Common Control with such persons; or (ii) having a controlling relationship with respect to one another; or (iii) who are under Common Control; or (iv) representing the same interest.
- **Individual Investment Program** - individual plans for acquisition of Company securities filed with the Company's headquarters, whereby the Persons Subject to this Policy have indicated their intention to invest their own money for the long term in Company securities.
- **Interested Parties** - any individual or group that can affect or be affected by the Company's or its Subsidiaries' opinions or actions. For example: members of the Executive Board and the Board of Directors, employees, suppliers, consumers, community, government, stockholders, among others.
- **IRO** – the Investor Relations Officer.
- **ITR** – the Quarterly Financial Information of the Company.
- **Management Bodies** – the Executive Board and the Board of Directors of the Company

- **Market Notice** – the means of disclosure of information that the Investor Relations Officer deems necessary or useful to disclose to the Capital Market Agents even if the information is not considered a Material Act or Fact or its disclosure is not required by law and regulation in force.
- **Material Act or Fact** – any decision of the Controlling Stockholder, resolution of the General Meeting or Management Bodies or any other act or fact of a political and administrative, technical, business or financial and economic nature that occurred or is related to the Company's and its Subsidiaries' and Affiliates' business, which might reasonably be expected to (i) affect the market value of the Securities, (ii) influence investor decisions to buy, sell or hold such Securities or (iii) influence investor decisions to exercise any rights inherent in the ownership of such Securities.
- **Material Information** – information about Material Acts or Facts that has not yet been disclosed to regulatory bodies, the Stock Exchange and other similar entities and stockholders and investors in general.
- **Material proceedings** - judicial, administrative or arbitration proceedings which is likely, in the judgment of the Company, to influence the investment decision of investors or potential investors, since they have the potential to (i) significantly impact the equity of the Company or its Subsidiaries as well as their financial condition and business development, and/or (ii) adversely affect the Company's image, and/or (iii) involve legal risks related to the discussion about the validity of the provisions of the Company's Bylaws.
- **Members under the bylaws** – members of the Bodies specifically provided for in the bylaws.
- **Privileged Information** – see Material Information.
- **Regulatory Bodies of the Company** – the Brazilian Securities Commission (CVM)
- **Related Persons** – persons who have the following relationships with the Members under the bylaws of the Company and its Subsidiaries and Associates or the Controlling Stockholder: (i) spouse if not legally separated; (ii) partner; (iii) any dependent for income tax purposes; and (iv) companies directly or indirectly Controlled by the Directors, Officers and the like or by the Related Persons.
- **Securities** - any stocks, debentures, subscription warrants, receipts and subscription rights, promissory notes, call or put options, indices and derivatives of any type or any other securities or collective investment contracts issued by the Company, or securities underlying such contracts, which are legally defined as securities
- **Stakeholders** – see Interested Parties
- **Stock Exchange** – domestic or overseas stock exchanges on which the securities issued by the Company are admitted to trading.

- **Subsidiaries** – companies controlled by the Company.
- **Subsidiary** - a corporation whose shares are all owned directly or indirectly by Caixa Seguridade, characterizing the subsidiary as a state-owned company.

## 6 PRINCIPLES

### 6.1 TRANSPARENCY

Timely, accurate, adequate and clear disclosure of information about any Company decisions and activities for stakeholders to understand and make informed decisions.

### 6.2 FAIRNESS

Just and equal treatment for all parties involved in the process.

### 6.3 CONFIDENTIALITY

Information shall be confidential and available only to authorized individuals and cannot be accessed by unauthorized parties.

### 6.4 COMPLIANCE

All routines and procedures are compliant with the relevant internal and external rules.

## 7 GUIDELINES

### 7.1 PERSONS SUBJECT TO THIS POLICY

The rules and guidelines of this Policy must be obeyed by:

- a) Members of Bodies created under the bylaws;
- b) Employees;
- c) Persons who, by virtue of their office, position or function at the Company, its Parent Company, its Subsidiaries or Associates, have access to Privileged Information; and
- d) Consultants.

The persons falling under one of the items above must provide a written Statement of Adherence to this Policy pursuant to article 16, paragraph 1 of CVM Instruction 358/02.

### 7.2 OBLIGATION TO INDEMNIFY

The persons who violate any provision of this Policy agree to indemnify the Company and/or other third party, fully and without limitation, for all losses that the Company and/or other third party may suffer or incur as a result of such

violation, subject to proper legal proceeding, the right to adversary proceeding and full defense.

### **7.3 VALIDITY AND REVISION**

This Policy shall become effective at the date it is approved by the Board of Directors and shall continue in effect for an indefinite term unless resolved otherwise, in accordance with pertinent regulation.

The provisions of this Policy shall be reviewed at least annually and if no revision is required, a technical report shall be presented to the Board of Directors with the justification for keeping the Policy as is.

### **7.4 THIRD-PARTY LIABILITY**

The provisions of this Policy do not preclude the liability of third parties not directly related to the Company and who have knowledge of a Material Act or Fact under any laws and regulations.

### **7.5 DUTY OF CONFIDENTIALITY**

Relevant Persons who are privy to any Material Act or Fact shall keep such information confidential until it is publicly disclosed and are responsible for assuring that their employees, Related Persons or others of their trust do so as well, and shall be jointly liable with such persons for breach of confidentiality.

The Company enters into confidentiality agreements with its business partners, especially Consultants, whenever they, by virtue of their services, consultations or for other reasons, have access to non-public information.

Please consult with the Company's IRO whenever in doubt about the materiality of the Privileged Information

### **7.6 RESPONSIBILITY FOR DISCLOSURE**

The Investor Relations Officer (IRO) has primary responsibility for the communication and disclosure of Material Acts or Facts occurring or relating to the business of the Company and its Associates and Subsidiaries, and for ensuring broad and immediate dissemination simultaneously to all markets in which such securities are admitted to trading.

The Persons subject to this Policy who have personal knowledge of a Material Act or Fact are required to communicate in writing such Material Act or Fact to the IRO.

If the Controlling Shareholder or Members of Technical and Advisory Bodies of the Company detect that the IRO has failed to fulfill his or her duty to communicate and disclose the Material Act or Fact – and where no decision has

been made to maintain confidentiality - they will only be released from responsibility if they promptly communicate the Material Act or Fact at issue to CVM.

If the Persons subject to this Policy inadvertently or without permission communicate in any way, personally or through third parties, any Privileged Information to a third party before disclosure to the market, they must immediately notify the IRO so as to permit the IRO to take action accordingly.

In case of unusual fluctuations in the market price or traded volumes of the Company's Securities, the IRO must initiate inquiries of the Persons subject to this Policy, including Controlling Shareholders and Directors and Officers, in order to find out whether they have knowledge of any information that should be disclosed to the market. The results of the investigation must be documented.

## **7.7 EXCEPTION TO IMMEDIATE DISCLOSURE**

Material Acts or Facts are exempted from disclosure if the Controlling Shareholders or Directors and Officers believe that such disclosure would prejudice the Company's legitimate interests.

The Controlling Shareholder or Directors and Officers will be required to immediately disclose, either directly or through the IRO, a Material Act or Fact in case of information leakage or unusual fluctuations in the market price or traded volume of the Securities.

The materiality of events pertaining to a Material Act or Fact must be assessed in the context of the normal course of business and the size of the Company as well as in the context of the information previously disclosed rather than in the abstract, in order to avoid banalization of disclosure of Material Acts or Facts to the detriment of the quality of the analysis by the market of the Company's prospects.

The Directors or Officers or any shareholder may ask the CVM to decide about the disclosure of any information that has not been disclosed, but this will not relieve them from the responsibility for the disclosure of the Material Act or Fact.

## **7.8 PROCEDURES**

The simultaneous public disclosure of a Material Act or Fact and a Market Notice seeks to ensure that all investors have access in a timely, efficient and reasonable manner to the information that would be expected to influence their investment decisions, while ensuring broad, non-exclusionary distribution of the information.

A Material Act or Fact and Market Notice will be communicated to the CVM through the electronic system available on CVM's website.

Simultaneously, the Material Act or Fact will be posted on the Company's website [www.caixaseguridade.com.br](http://www.caixaseguridade.com.br), both in Portuguese and in English, and disseminated through a newswire portal with free public access or a widely circulated newspapers normally used by the Company, in summary form, indicating the web address where a full set of information will be available.

The Market Notice will be posted simultaneously on the Company's website [www.caixaseguridade.com.br](http://www.caixaseguridade.com.br).

Additionally, the Company has an online information disclosure system through which it distributes information via e-mails to the persons kept on the list created for this purpose.

Market announcements must be clear, accurate, complete and impartial and written in a plain language designed to be understandable by the investing public, containing all technical information required to make the disclosure not misleading.

Whenever possible, the disclosure of a Material Act or Fact or a Market Notice will be made before the opening or after the closing of trading on the Stock Exchanges. In the event of incompatibility, the trading hours for the Brazilian market shall prevail.

If the information leaks, the IRO must take immediate steps to ensure that a full public announcement is made. In addition, the IRO must:

- a) communicate and disclose a Material Act or Fact that has occurred or is related to the business of the Company immediately after its occurrence, preferably after the close of the trading session;
- b) if the information is disclosed before the opening of trading on the exchange, disclosure must be made at least 30 minutes before the scheduled opening time on the exchange so as to allow for dissemination of the information;
- c) where it is necessary to disclose a Material Act or Fact during the exchange trading session, the IRO will request the Stock Exchanges to halt trading in the Securities for the time required to promote the proper dissemination of the Material Information, according to the procedures set forth in the Stock Exchange rules;
- d) provide the competent bodies, upon request, with clarification about the disclosure of a Material Act or Fact or Market Notice.

## 7.9 INFORMATION CONTROL

The principles and guidelines for the protection and proper use of information assets owned by the Company or under its custody are detailed in the Information Security Policy of Caixa Seguridade Participações S.A. - XS006.



Classification of data based on its level of sensitivity is obligatory at Caixa Seguridade for all data and information produced by it or under its custody, regardless of the support or means used to store or transmit the data. There is a specific guidance on information classification and handling - XS601.

The Company tracks the news about it in the media outlets and social media and evaluates the need to respond to market rumors or speculation even if no leak of material information is detected.

If there is a leak of material information, the IRO is required to:

- a) communicate the Material Information immediately to the CVM and the Stock Exchange;
- b) disclose the Material Information simultaneously to the market;
- c) investigate the facts underlying the case in order to determine the cause of the leak;
- d) make inquiries of the Persons subject to this Policy, including Controlling Shareholders and Directors and Officers, about the occurrence of the leak to discover facts or relations with third parties that may have led to the leak, and document these inquiries;
- e) communicate the leak to the Executive Board; and
- f) make inquiries of Representatives of the federal government and regulatory bodies, and document these inquiries.

A violation of this Policy, especially of the duty of confidentiality, subjects the violator to internal sanctions by the Company, without prejudice to administrative, civil and criminal penalties.

## 7.10 OBJECTIVE CRITERIA FOR DISCLOSURE

In addition to legal and regulatory requirements, the criteria established below must be considered for disclosing information concerning Material Litigation:

MATERIAL LITIGATION / RISK OF LOSS FOR THE COMPANY	PROBABLE	POSSIBLE	REMOTE
Below 1 RV	-	-	-
Between 1 and 3 RV	Material Fact	Market notice	-
Above 3 RV	Material Fact	Market notice	Market notice

For the purposes of this item, "RV" means Reference Value, i.e. 1% of the Company's equity based on the last financial year closed.

The logo for CAIXA, featuring the word "CAIXA" in a bold, blue, sans-serif font. The letter "X" is stylized with an orange diagonal stroke.

seguridade